

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

S3G TECHNOLOGY LLC,

Plaintiff,

v.

UNIKEY TECHNOLOGIES, INC.,

Defendant.

Case No. 6:16-cv-400

RWS-KNM

**JURY TRIAL DEMANDED**

**PLAINTIFF S3G TECHNOLOGY LLC’S ANSWER TO THE COUNTERCLAIMS OF  
DEFENDANT UNIKEY TECHNOLOGIES, INC.**

Plaintiff S3G Technology LLC (“S3G”) hereby responds as follows to the Counterclaims of Defendant UniKey Technologies, Inc.’s (“UniKey”) asserted in response to S3G’s Complaint for Patent Infringement. S3G expressly denies that UniKey is entitled to any relief whatsoever in connection with its Counterclaims, including, but not limited to, all relief requested in the Prayer for Relief in UniKey’s Counterclaims.

**JURISDICTION AND VENUE**

1. Responsive to Counterclaim Paragraph 1, S3G admits the allegations.
2. Responsive to Counterclaim Paragraph 2, S3G admits that this Court has personal jurisdiction over S3G.
3. Responsive to Counterclaim Paragraph 3, S3G admits that venue is proper in this District for UniKey’s counterclaims.

**THE PARTIES**

4. Responsive to Counterclaim Paragraph 4, based on information and belief, S3G admits the allegations.

5. Responsive to Counterclaim Paragraph 5, S3G admits the allegations.

**FIRST COUNTERCLAIM**

6. Responsive to Counterclaim Paragraph 6, S3G incorporates by reference its responses to the allegations in Paragraphs 1-5 above as though fully set forth herein.

7. Responsive to Counterclaim Paragraph 7, S3G admits the allegations.

8. Responsive to Counterclaim Paragraph 8, to the extent a response is required, S3G admits the allegations.

9. Responsive to Counterclaim Paragraph 9, S3G denies the allegations.

10. Responsive to Counterclaim Paragraph 10, S3G denies the allegations.

11. Responsive to Counterclaim Paragraph 11, S3G denies the allegations.

12. Responsive to Counterclaim Paragraph 12, S3G denies the allegations.

**SECOND COUNTERCLAIM**

13. Responsive to Counterclaim Paragraph 13, S3G incorporates by reference its responses to the allegations in Paragraphs 1-12 above as though fully set forth herein.

14. Responsive to Counterclaim Paragraph 14, S3G admits the allegations.

15. Responsive to Counterclaim Paragraph 15, to the extent a response is required, S3G admits the allegations.

16. Responsive to Counterclaim Paragraph 16, S3G denies the allegations.

17. Responsive to Counterclaim Paragraph 17, S3G denies the allegations.

18. Responsive to Counterclaim Paragraph 18, S3G denies the allegations.

19. Responsive to Counterclaim Paragraph 19, S3G denies the allegations.

**THIRD COUNTERCLAIM**

20. Responsive to Counterclaim Paragraph 20, S3G incorporates by reference its responses to the allegations in Paragraphs 1-19 above as though fully set forth herein.

21. Responsive to Counterclaim Paragraph 21, S3G admits the allegations.

22. Responsive to Counterclaim Paragraph 22, to the extent a response is required, S3G admits the allegations.

23. Responsive to Counterclaim Paragraph 23, S3G denies the allegations.

24. Responsive to Counterclaim Paragraph 24, S3G denies the allegations.

25. Responsive to Counterclaim Paragraph 25, S3G denies the allegations.

26. Responsive to Counterclaim Paragraph 26, S3G denies the allegations.

#### **FOURTH COUNTERCLAIM**

27. Responsive to Counterclaim Paragraph 27, S3G incorporates by reference its responses to the allegations in Paragraphs 1-26 above as though fully set forth herein.

28. Responsive to Counterclaim Paragraph 28, to the extent a response is required, S3G admits the allegations.

29. Responsive to Counterclaim Paragraph 29, S3G denies the allegations.

30. Responsive to Counterclaim Paragraph 30, S3G denies the allegations.

#### **FIFTH COUNTERCLAIM**

31. Responsive to Counterclaim Paragraph 31, S3G incorporates by reference its responses to the allegations in Paragraphs 1-30 above as though fully set forth herein.

32. Responsive to Counterclaim Paragraph 32, to the extent a response is required, S3G admits the allegations.

33. Responsive to Counterclaim Paragraph 33, S3G denies the allegations.

34. Responsive to Counterclaim Paragraph 34, S3G denies the allegations.

#### **SIXTH COUNTERCLAIM**

35. Responsive to Counterclaim Paragraph 35, S3G incorporates by reference its responses to the allegations in Paragraphs 1-34 above as though fully set forth herein.

36. Responsive to Counterclaim Paragraph 36, to the extent a response is required, S3G admits the allegations.

37. Responsive to Counterclaim Paragraph 37, S3G denies the allegations.

38. Responsive to Counterclaim Paragraph 38, S3G denies the allegations.

**RELIEF REQUESTED**

WHEREFORE, S3G prays that this Court enter judgment against UniKey on UniKey's Counterclaims as follows:

(a) Dismissing UniKey's Counterclaims with prejudice and ordering that UniKey is entitled to no recovery whatsoever on its Counterclaims, including without limitation all relief sought in UniKey's Prayer for Relief in its Counterclaims;

(b) Ordering that this is an exceptional case, pursuant to 35 U.S.C. § 285, and

(c) Awarding S3G its attorney fees and full costs of suit; and

(d) Awarding S3G such other and further relief as this Court deems just and appropriate.

**JURY DEMAND**

S3G demands a jury trial on all issues so triable.

DATED: July 25, 2016

Respectfully Submitted,

**OF COUNSEL:**

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**ATTORNEYS FOR PLAINTIFF S3G  
TECHNOLOGY LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that the following counsel of record, who are deemed to have consented to electronic service are being served this 25<sup>th</sup> day July, 2016, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile transmission and/or first class mail on this same date.

/s/ Charles Ainsworth  
CHARLES AINSWORTH